

International Telcom, Ltd

417 2nd Ave W
Seattle, WA 981

DOCKET FILE COPY ORIGINAL

RECEIVED

NOV 6 2001

FCC MAIL ROOM

October 31, 2001

Letter of Appeal
FCC, Office of the Secretary
445 12th St SW
Washington DC 20554

In the Matter of: Request for review by International Telcom, Ltd of Decision of Universal Service Administrator RE: FCC Docket Nos. 97-21 and 96-45, Filer 499 ID #811580.

Dear Sir or Madame;

On May 2, 2001, I sent a Revised 499a 2000 report (Attachment "A") to the USAC and the FCC. On June 25, 2001, I called NECA because I had not yet received a response from anyone regarding the revised filing. I spoke with Anna and faxed a copy of the revised form on that date. On June 28, 2001 I received a letter of rejection from the USAC (Attachment "B").

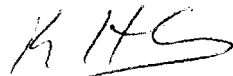
We disagree with the rejection of the form for two reasons.

1. The revised worksheet was sent only one month past the one year from the original due date policy of accepting revised forms. Before the due date, I spoke with Tabreeka Elmore and was told the due date was a general rule and that revised forms were accepted after the one-year period.
2. The "original" form that was used as the 2000 FCC Form 499A was completed on the 1999 form (Attachment "C") by a former employee who was not familiar with the filing requirements. In our files, I found a letter stating it was not the proper form (Attachment "D"). I am not sure where she got the figures used to complete the form. The boxes were not checked so I am uncertain whether she was attempting to file a revised form for 1999 or if it was suppose to be an original 2000 filing.

I request the revised form to be accepted or the 1999 Form that was sent disregarded and the revised form be used as the original and that all adjustments be made to the past billing amounts for all fees.

Please let me know if I more information is needed.

Thank You,



Ken Hanks
Senior Tax Analyst
(206) 479-2295

No. of Copies rec'd 0
List A B C D E

Attachment "A"

2000 FCC Form 499A Telecommunications Reporting Worksheet

Page 2

Block 2-A: Personal Contact Information

| | |
|---|---|
| 201 Filer 499 ID [from Line 101] | 801580 |
| 202 Legal name of reporting entity [from Line 102] | International Telcom, Ltd |
| 203 Person who completed this worksheet | Ken Hanks |
| 204 Telephone number of this person | (206)-479-2295 |
| 205 Fax number of this person | (206)-479-2220 |
| 206 E-mail of this person | KHanks@ms.kallback.com |
| 207 Corporate office, attn. name, and mailing address to which future Telecommunications Reporting Worksheets should be sent | International Telcom, Ltd Attn: Ken Hanks 417 2nd Ave W Seattle, WA 98119 |
| 208 Billing address and billing contact person: [Plan administrators will send bills for contributions to this address. Please attach a written request for alternative billing arrangements.] | Same as Above |

Block 2-B: Agent for Service of Process

All carriers must complete Lines 209 through 213

| | |
|--|--|
| 209 D.C. Agent for Service of Process per 47 U.S.C 413 | National Registered Agents, Inc. |
| 210 Telephone number of D.C. agent | (800)-848-0489 |
| 211 Fax number of D.C. agent | (609)-883-7891 |
| 212 E-mail of D.C. agent | |
| 213 Complete business address of D.C. agent for hand service of documents | 1090 Vermont Ave NW Washington DC 20005 |
| 214 Alternate Agent for Service of Process (optional) | NA |
| 215 Telephone number of alternate agent | NA () - |
| 216 Fax number of alternate agent | NA () - |
| 217 E-mail of alternate agent | NA |
| 218 Complete business address of alternate agent for hand service of documents | NA |

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

 FCC Form 499-A
February 2000

2000 FCC Form 499A Telecommunications Reporting Worksheet

>>> Please read instructions before completing. <<<

 Approval by OMB
3060-0855

Annual Filing - due April 1.

Block 1: Contributor Identification Information

101 Filer 499 ID [If you don't know your number, contact the administrator at (973)-560-4400.]

801580

If you are a new filer, leave blank and a Filer 499 ID will be assigned to you.

102 Legal name of reporting entity

International Telcom, Ltd

103 IRS employer identification number

91-1579975

104 Name telecommunications service provider is doing business as

International Telcom, Ltd.

105 Principal communications business [Check the one that best describes the reporting entity -- see directions. Check one box only.]

☐ CAP/CLEC

☐ Cellular/PCS/SMR (wireless telephony incl. by resale)

☐ Incumbent LEC

☒ Interexchange Carrier (IXC)

☐ Local Reseller

☐ Operator Service Provider (OSP)

☐ Paging & Messaging

☐ Payphone Service Provider

☐ Pre-paid Card

☐ Private Service Provider

☐ Satellite

☐ Wireless Data

☐ Shared Tenant Service Provider

☐ SMR (dispatch)

☐ Toll Reseller

☐ Other Toll

If Other Local, Other Mobile or Other Toll is checked,

☐ Other Local

☐ Other Mobile

describe carrier type / services provided:

106 Holding company (All affiliated companies should show same name here)

NA

107 FCC Registration Number (FRN) [not required for April 2000 filing]

NA

108 Management company [if carrier is managed by another entity]

NA

 109 Complete mailing address of reporting entity
corporate headquarters

 417 2nd Ave W
Seattle, WA 98119

 110 Complete business address for customer inquiries and complaints
[if different from address entered on Line 109]

Same as Above

111 Telephone number for customer inquiries and complaints

(800) - 959-5255

 112 All trade names that you use in providing telecommunications services. This should
include all names by which you are identified on customer bills.

a

Kallback

g

h

b

KallCent\$

i

c

Faxaway

j

d

k

e

l

f

m

Use an additional sheet if necessary. Each reporting entity must provide all names used for carrier activities.

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

FCC Form 499-A

February 2000

2000 FCC Form 499A Telecommunications Reporting Worksheet

Page 3

Block J: Carrier's Carrier Revenue Information

| | | | | | |
|---|---------------------------|---|---------------------------|------------------------------|--|
| 301 Filer 499 ID (from Line 101) | 801580 | | | | |
| 302 Legal name of reporting entity (from Line 102) | International Telcom, Ltd | | | | |
| Report Billed Revenue for January 1 through December 31, 1999 Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars. | Total Revenue (a) | If breakouts are not book amounts, enter whole percentage estimates | | Breakouts | |
| Interstate (b) | | International (c) | Interstate Revenue (d) | International Revenue (e) | |
| See instructions regarding percent Interstate & International. | | | | | |
| Revenue from Service Provided for Resale by Other Contributors to Federal Universal Service Support Mechanisms | | | | | |
| <u>Fixed local service</u> | | | | | |
| 303 Monthly service, local calling, connection charges, vertical features, and other local exchange service including subscriber line and PICC charges to IXCs | | | | | |
| a Provided as unbundled network elements | | | | | |
| b Provided under other arrangements | | | | | |
| 304 Per minute charges for originating or terminating calls | | | | | |
| a Provided under state or federal access tariff | | | | | |
| b Provided as unbundled network elements or other contract arrangement | | | | | |
| 305 Local private line & special access | | | | | |
| 306 Payphone compensation from toll carriers | | | | | |
| 307 Other local telecommunications service revenues | | | | | |
| 308 Universal service support revenue received from Federal or State Sources | | | | | |
| <u>Mobile service (including wireless telephony, paging & messaging, and other mobile services)</u> | | | | | |
| 309 Monthly, activation, and message charges except toll | | | | | |
| <u>Toll service</u> | | | | | |
| 310 Operator and toll calls with alternative billing arrangements (credit card, collect, International call-back, etc.) | | | | | |
| 311 Ordinary Long Distance (MTS, customer toll free 800/888 service, associated monthly account maintenance, PICC pass-through, and switched services not reported above) | 13,272,034 | | | | |
| 312 Long distance private line services | | | | | |
| 313 Satellite services | | | | | |
| 314 All other long distance services | | | | | |

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

FCC Form 499-A
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2000 FCC Form 499A Telecommunications Reporting Worksheet

Page 4

Block 4: End User and Non-Telecommunications Revenue Information

| | | | | | |
|--|---------------------------|---|---------------|--------------------|-----------------------|
| 401 Filer 499 ID [from Line 101] | 801580 | | | | |
| 402 Legal name of reporting entity [from Line 102] | International Telcom, Ltd | | | | |
| Report Billed Revenue for January 1 through December 31, 1999 Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars. See instructions regarding percent Interstate & International. | Total Revenue | If breakouts are not book amounts, enter whole percentage estimates | | Breakouts | |
| | | Interstate | International | Interstate Revenue | International Revenue |
| Revenue From All Other Sources (end-user telcom. & non-telcom.) | (a) | (b) | (c) | (d) | (e) |
| 403 Surcharges or other amounts on bills identified as recovering State or Federal universal service contributions | 257,992 | | | 38,053 | 219,939 |
| <u>Fixed local service</u> | | | | | |
| 404 Monthly service, local calling, connection charges, vertical features, and other local exchange service charges except for federally tariffed subscriber line charges and PICC charges | | | | | |
| 405 Tariffed subscriber line charges and PICC charges levied by a local exchange carrier on a no-PIC customer | | | | | |
| 406 Local private line and special access service | | | | | |
| 407 Payphone coin revenues | | | | | |
| 408 Other local telecommunications service revenues | | | | | |
| <u>Mobile service (including wireless telephony, paging & messaging, and other mobile services)</u> | | | | | |
| 409 Monthly and activation charges | | | | | |
| 410 Message charges including roaming but excluding toll charges | | | | | |
| <u>Toll service</u> | | | | | |
| 411 Pre-paid calling card (including card sales to customers and non-carrier distributors) reported at face value of cards | | | | | |
| 412 International calls that both originate and terminate in foreign points | 13,973,245 | 0% | 100% | - | 13,973,245 |
| 413 Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.) other than revenue reported on Line 412 | | | | | |
| 414 Ordinary Long Distance (MTS, customer toll free 800/888 service, associated monthly account maintenance, PICC pass-through, and other switched services not reported above) | 2,999,911 | | | 442,477 | 2,557,434 |
| 415 Long distance private line services | | | | | |
| 416 Satellite services | | | | | |
| 417 All other long distance services | | | | | |
| 418 Enhanced services, inside wiring maintenance, billing and collection, customer premises equipment, published directory, dark fiber, Internet and non-telecommunications service revenue | 7,318,917 | | | | |
| 419 Gross billed revenue from all sources [incl. reseller & non-telcom.] [Lines 303 through 314 plus Lines 403 through 418] | 37,822,099 | | | | |
| 420 Universal service contribution bases [Lines 403 through 411 & Lines 413 through 417] | 3,257,903 | | | 480,530 | 2,777,373 |

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

2000 FCC Form 499A Telecommunications Reporting Worksheet

Page 5

Block 5: Additional Revenue Breakouts

| | |
|--|----------------------------|
| 501 Filer 499 ID [from Line 101] | 801580 |
| 502 Legal name of reporting entity [from Line 102] | International Telecom, Ltd |

Most filers must contribute to LNP administration and must provide the percentages requested in Lines 503 through 510. Filing entities that use Line 603 to certify that they are exempt from this requirement need not provide this information.

Percentage of revenue reported in Block 3 and Block 4 billed in each region of the country. Round or estimate to nearest whole percentage. Enter 0 if no service was provided in the region.

| | | | Block 3 Carrier's Carrier (a) | Block 4 End-User Telecom. (b) |
|-----|---------------|---|--|--|
| 503 | Southeast: | Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Puerto Rico, South Carolina, Tennessee and U.S. Virgin Islands | 1 % | 14 % |
| 504 | Western: | Alaska, Arizona, Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, Wyoming | 1 % | 19 % |
| 505 | West Coast: | California, Hawaii, Nevada, American Samoa, Guam, Northern Mariana Islands, and Wake Island. | 16 % | 22 % |
| 506 | Mid-Atlantic: | Delaware, District of Columbia, Maryland, New Jersey, Pennsylvania, Virginia, West Virginia | 20 % | 10 % |
| 507 | Mid-West: | Illinois, Indiana, Michigan, Ohio, Wisconsin | 2 % | 11 % |
| 508 | Northeast: | Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, Vermont | 60 % | 15 % |
| 509 | Southwest: | Arkansas, Kansas, Missouri, Oklahoma, & Texas | 0 % | 9 % |
| 510 | Total | [Percentages must add to 0 or 100] | 100 % | 100 % |

511 Revenues from resellers that do not contribute to Universal Service support mechanisms are included in Block 4, Line 420 but may be excluded from a filer's TRS, NANPA and LNP contribution bases. To have these amounts excluded, the filer has the option of identifying such revenues below.

| | (a) | (b) |
|---|---------------|------------------------------|
| | Total Revenue | Interstate and International |
| Revenues from resellers that do not contribute to Universal Service | \$ 0 | \$ 0 |

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

FCC Form 499-A
February 2000

2000 FCC Form 499A Telecommunications Reporting Worksheet

Page 6

Block 6: CERTIFICATION: to signed by an officer of the filer

| | |
|--|---------------------------|
| 601 Filer 499 ID [from Line 101] | 801580 |
| 602 Legal name of reporting entity [from Line 102] | International Telcom, Ltd |

Section IV of the instructions provides information on which types of reporting entities are required to file for which purposes. Any entity claiming to be exempt from one or more contribution requirements should so certify below and attach an explanation. [The Universal Service administrator will determine which entities meet the de minimis threshold based on information provided in Block 4, even if you fail to so certify, below.]

603 I certify that the reporting entity is exempt from contributing to:

Universal Service ☐TRS ☐NANPA ☐LNP Administration ☐

Provide explanation below:

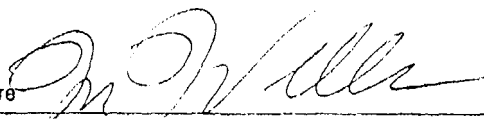
| |
|--|
| |
| |
| |
| |
| |
| |

604 I certify that the revenue data contained herein is privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to Sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules.



I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true and that said Worksheet is an accurate statement of the affairs of the above-named company for the previous calendar year.

605 Signature



606 Printed name of officer

Mike Wells

607 Position with reporting entity

CFO

608 Date

609 This filing is:

☐ Original filing☒ Revised filing

Do not mail checks with this form. Send this form to: Form 499 c/o NECA, 89 South Jefferson Road, Whippany New Jersey, 07981

For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet information: (973) 560-4400 or via e-mail: Form499@neca.org

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

Attachment "B"



Universal Service Administrative Company

June 27, 2001

International Telecom, Ltd.
417 2nd Ave. W
Seattle, WA 98119

Filer 499 ID: 811580

Attn: Ken Hanks

RE: Form 499-A Revision Rejection

The Universal Service Administrative Company (USAC) has completed a review of the Revised FCC Form 499-A that you submitted for the purpose of revising revenue reported by International Telecom, Ltd. for the period January 1 – December 31, 1999. Based on the information provided, we are unable to accept the revision because it was not filed within one year of the original submission.

USAC recognizes that you may disagree with our decision. **If you wish to file an appeal, your appeal must be received no later than 30 days after the date of this letter.**

In the event that you choose to appeal the decision, you should follow these guidelines:

- Write a "Letter of Appeal to USAC" explaining why you disagree with this Revised Form 499-A Rejection letter and identify the outcome that you request;
- Mail your letter to:
Letter of Appeal
USAC
2120 L Street, NW, Suite 600
Washington, DC 20037
- Appeals submitted by fax, telephone call, and e-mail **will not** be processed.
- Provide necessary contact information. Please list the name, address, telephone number, fax number, and e-mail address (if available) of the person who can most readily discuss this appeal with USAC.
- Identify the "Legal Reporting Name" and "Filer 499 ID."
- Explain the appeal to the USAC. Please provide documentation to support your appeal.

- Attach a photocopy of this Revised Form 499-A Rejection decision that you are appealing.

USAC will review all “letters of appeal” and respond in writing within 90 days of receipt thereof.

The response will indicate whether USAC:

- (1) agrees with your letter of appeal, and approves an outcome that is different from the Revised Form 499-A Rejection Letter; or
- (2) disagrees with your letter of appeal, and the reasons therefor.

If you disagree with the USAC response to your “letter of appeal,” you may file an appeal with the FCC within 30 days of the date USAC issued its decision in response to your “Letter of Appeal.” The FCC address where you may direct your appeal is:

Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-A325
Washington, DC 20554

Please be sure to indicate the following information on all communications with the FCC:
“Docket Nos. 96-45 and 97-21.”

In the alternative, you may write and send an appeal letter directly to the Federal Communications Commission (FCC), and bypass USAC. Your letter of appeal to the FCC must explain why you disagree with the USAC decision. You are also encouraged to submit any documentation that supports your appeal. The FCC rules governing the appeals process (Part 54 of Title 47 of the Code of Federal Regulations 54.719 – 54.725) are available on the FCC web site (www.fcc.gov).

If you have questions or concerns regarding this letter, please contact Lisa Harter at (973) 884-8116 or Lori Terraciano at (973) 560-4426.

Sincerely,

USAC

Attachment "C"

3 FCC Form 499A Telecommunications Reporting Worksheet

>>> Please read instructions before completing. <<<

Approval by OMB

3060-0855

Expires _/_/

Annual Filing - due April 1.

Block 1: Contributor Identification Information

101

Filer 499 ID

102 Legal name of reporting entity

International Telecom Ltd

103 IRS employer identification number

91-1579975

104 Name telecommunications service provider is doing business as

International Telecom LTD

105 Principal communications business (check the one that best describes the reporting entity - see directions)

☐ CAP/CLEC

☐ Cellular/PCS/SMR (wireless telephony incl. by resale)

☐ Incumbent LEC

☐ IXC

☐ Local Reseller

☐ OSP

☐ Paging & Messaging

☐ Payphone Service Provider

☐ Pre-paid Card

☐ Private Service Provider

☐ Satellite

☐ Shared Tenant Service Provider

☐ SMR (dispatch)

☒ Toll Reseller

☐ Wireless Data

If Other Local, Other Mobile or Other Toll is checked,

☐ Other Local

☐ Other Mobile

☐ Other Toll

describe carrier type / services provided:

106 Holding company (All affiliated companies should show same name here)

107 Management company (if carrier is managed by another entity)

108 Complete mailing address of reporting entity
corporate headquarters

417 2nd Ave W
Seattle WA 98119-4012

109 Complete business address for customer inquiries and complaints
(if different from address entered on Line 108)

110 Telephone # for customer inquiries and complaints

() -

111 Additional Names For Carrier Activities

a

f

b

g

c

h

d

i

e

j

k

Block 2-A: Personal Contact Information

112 Person who completed this worksheet

Stephanie Metcalf

113 Telephone number of this person

(206)-479-2295

114 Fax number of this person

(206)-284-4381

115 E-mail of this person

Smetcalf@ms.kallback.com

116 Corporate office, attn. name, and mailing
address to which future Telecommunications
Reporting Worksheets should be sent

Attn: Stephanie Metcalf

117 Billing address:

[Plan administrators will send bills for
contributions to this address]

SAME AS ABOVE

Block 2-B: Agent for Service of Process

118 D.C. Agent for Service of Process per 47 U.S.C 413

National Corporate Research Ltd.

119 Telephone number of D.C. agent

() -

120 Fax number of D.C. agent

() -

121 E-mail of D.C. agent

122 Complete business address of D.C. agent
for hand service of documents

400 Seventh St. N.W Suite 101
Washington DC 20004

123 Alternate Agent for Service of Process (optional)

124 Telephone number of alternate agent

() -

125 Fax number of alternate agent

() -

126 E-mail of alternate agent

127 Complete business address of alternate
agent for hand service of documents

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

FCC Form 499-A

July 1999

MAY 30 AMSD

1999 FCC Form 499A Telecommunications Reporting Worksheet

Page 2

| Block 3: Contributor Revenue Information | | 201 | Filer 499 ID | |
|---|---|---------------------------|---|---|
| 202 | Legal Name of Reporting Entity (from Line 101) | International Telecom LTD | | |
| Report Billed Revenue for January 1 through December 31, 1998 Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars. See instructions regarding percent interstate & international. | | Total Revenue (a) | Percent Interstate & International (b) | Interstate and International Revenue (c) |
| Revenue from Service Provided for Resale to Other Contributors to Federal Universal Service Support Mechanisms | | | | |
| <u>Fixed local service</u> | | | | |
| 203 | Monthly service, local calling, connection charges, vertical features, and other local exchange service including PICC charges to IXCs | | | |
| a | Provided as unbundled network elements | | | |
| b | Provided under other arrangements | | | |
| 204 | Per minute charges for originating or terminating calls | | | |
| a | Provided under state or federal access tariff | 13097440 | 0 | 0 |
| b | Provided as unbundled network elements or other contract arrangement | | | |
| 205 | Local private line & special access | 108843 | 0 | 0 |
| 206 | Payphone compensation from toll carriers | | | |
| 207 | Other local telecommunications service revenues | | | |
| 208 | Universal service support revenue received from Federal or State Sources | | | |
| <u>Mobile service (including wireless telephony, paging & messaging, and other mobile services)</u> | | | | |
| 209 | Monthly, activation, and message charges except toll | | | |
| <u>Toll service</u> | | | | |
| 210 | Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.) | | | |
| 211 | Ordinary Long Distance (MTS, customer toll free 800/888 service and switched services not reported above) | | | |
| 212 | Long distance private line services | | | |
| 213 | Satellite services | | | |
| 214 | All other long distance services | | | |
| Revenue From All Other Sources (end-user telecom. & non-telecom.) | | | | |
| 215 | Surcharges or other amounts on bills identified as recovering State or Federal universal service contributions | | | |
| <u>Fixed local service</u> | | | | |
| 216 | Monthly service, local calling, connection charges, vertical features, and other local exchange service charges except for federally tariffed subscriber line charges | | | |
| 217 | Tariffed subscriber line charges and PICC charges to end users | | | |
| 218 | Local private line and special access service | | | |
| 219 | Payphone coin revenues | | | |
| 220 | Other local telecommunications service revenues | | | |
| <u>Mobile service (including wireless telephony, paging & messaging, and other mobile services)</u> | | | | |
| 221 | Monthly and activation charges | | | |
| 222 | Message charges including roaming but excluding toll charges | | | |
| <u>Toll service</u> | | | | |
| 223 | Pre-paid calling card (including card sales to customers and to retail establishments) | | | |
| 224 | International calls that both originate and terminate in foreign points | 25,372,242 | 100% | 25,372,242 |
| 225 | Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.) other than revenue reported on line 224 | | | |
| 226 | Ordinary Long Distance (MTS, customer toll free 800/888 service and switched services not reported above) | 9,315,794 | 98.2 | 9,148,110 |
| 227 | Long distance private line services | | | |
| 228 | Satellite services | | | |
| 229 | All other long distance services | | | |
| 230 | Enhanced services, inside wiring maintenance, billing and collection, customer premises equipment, published directory, dark fiber and non-telecommunications service revenue | 712,9683 | | |
| 231 | Gross billed revenue from all sources (incl. reseller & non-telecom.) | 55,024,002 | | |
| 232 | Universal service contribution bases (lines 215 through 223 & lines 225 through 229) | 9,315,794 | | 9,148,110 |

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

FCC Form 499-A
July 1999

1999 FCC Form 499A Telecommunications Reporting Worksheet

Page 3

Block 4: CERTIFICATION: to signed by an officer of the filer

301

Filer 499 ID

302 Legal name of reporting entity (from Line 101) International Telecom LTD

Section IV of the instructions provides information on which types of reporting entities are required to file for which purposes. Any entity claiming to be exempt from one or more contribution requirements should so certify below and attach an explanation.

303 I certify that the reporting entity is exempt from contributing to:

Universal Service ☐TRS ☐NANPA ☐LNP Administration ☐

Filers that did not certify that they are exempt from contributing to LNP administration in Line 304 must provide the following breakout:

Percentage of revenue reported in Block 3 billed in each region of the country. Round or estimate to nearest whole percentage. Enter 0 if no service was provided in the region.

| | | | Carrier's Carrier (a) | End User (b) |
|-----|---------------|---|-----------------------------|--------------------|
| 304 | Southeast: | Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Puerto Rico, South Carolina, Tennessee and U.S. Virgin Islands | % | % |
| 305 | Western: | Alaska, Arizona, Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, Wyoming | % | % |
| 306 | West Coast: | California, Hawaii, Nevada, American Samoa, Guam, Northern Mariana Islands, and Wake Island. | % | % |
| 307 | Mid-Atlantic: | Delaware, District of Columbia, Maryland, New Jersey, Pennsylvania, Virginia, West Virginia | % | % |
| 308 | Mid-West: | Illinois, Indiana, Michigan, Ohio, Wisconsin | % | % |
| 309 | Northeast: | Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, Vermont | % | % |
| 310 | Southwest: | Arkansas, Kansas, Missouri, Oklahoma, & Texas | % | % |
| 311 | Total | (Percentages must add to 0 or 100) | % | % |

312 Revenues from resellers that do not contribute to Universal Service support mechanisms are included in Lines 215 through 229 but may be excluded from a filer's TRS, NANPA and LNP contribution bases. To have these amounts excluded, filer has the option of identifying such revenues.

| | (a) Total Revenue | (c) Interstate and International |
|---|----------------------|-------------------------------------|
| Revenues from resellers that do not contribute to Universal Service | \$ <u>34,688,036</u> | \$ <u>34,520,352</u> |

313 I certify that the revenue data contained herein is privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to Sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules. ☐

I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true and that said Worksheet is an accurate statement of the affairs of the above-named company for the previous calendar year.

314 Signature

315 Printed name of officer

316 Position with reporting entity

317 Date

318 This filing is:

☐ Original filing☐ Revised filing

Do not mail checks with this form. Send this form to: Telecommunications Reporting Worksheet, Box _____, _____
For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet information (xxx) TBA-xxxx

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

FCC Form 499-A
July 1999

Attachment "D"

NECA NATIONAL EXCHANGE CARRIER ASSOCIATION INC

80 South Jefferson Rd.
Whippany, NJ 07981
Phone: 973/560-4426
Fax: 973/560-4434
E-Mail: Lterracc@NECA.org

Lori S. Terraciano
Associate Manager-
Revenue Administration

DATE: 6/7/00
TO: Telecommunications Reporting Worksheet Filer (Filer 499 ID 811580)
FROM: NECA, Form 499 Data Collection Agent
RE: April 1, 2000 FCC Form 499-A Submission

The enclosed FCC Form 499-A has been returned for the following reason(s):

- ☐ Missing Officer Signature (Pg. 6, Block 5, Line 605)
- ☐ No interstate percentages or revenues reported (Pg. 3 & 4, Blocks 3 & 4, Columns b & d). Please provide a good-faith estimate of interstate revenues if actual figures are not available, or provide supporting documentation that your company provides intrastate services only.
- ☐ No "Revenue From All Other Sources" (revenue received from billing an end-user directly) reported (Pg. 4, Block 4, Lines 403 - 417, Columns a, b, c, d & e). Please confirm that your company provides wholesale services only or report revenue in Block 4.
- ☐ The percentage interstate on Line 405, Column b is less than 100%. Please verify the revenue reported on this line contains state tariffed access charges; if it does not, Line 405, Column b should be 100%.
- ☐ Identical revenue is reported in both "Revenues From Services Provided for Resale by Other Contributors to Federal Universal Service Support Mechanisms" and "Revenue From All Other Sources (revenue from billing an end-user directly)" (Pg. 3 & 4, Lines 303 - 314 and Lines 403 - 417, Columns a, b, c, d & e).
- ☐ Negative revenue reported (Pg. 3, 4 & 5, Blocks 3, 4 and 5).
- ☒ Wrong Form filed.
- ☐ Other: _____

A response to the question(s) checked above are required within one week of receiving this letter. Please direct your response to:

NECA- Form 499 Data Collection Agent
Attn: Lori Terraciano
80 South Jefferson Rd.
Whippany, NJ 07981

FCC Form 499-A worksheet instructions are enclosed. If you have a question that is not covered in the instructions, you may contact a customer service representative at the Form 499 help line at 973-560-4400 or via e-mail at Form499@neca.org.

Thank you,

Lori Terraciano